

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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July 19, 2023

**VIA ECF**

The Honorable Taryn A. Merkl, U.S.M.J.  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Hernandez v. Happy Street LLC et al*  
**Case No.: 1:22-cv-06918-DG-TAM**

Dear Honorable Magistrate Judge Merkl:

This law firm represents plaintiff Aaron Hernandez (the “Plaintiff”) in the above-referenced matter.

Pursuant to the directives in Your Honor’s June 21, 2023 Status Report Order this letter respectfully serves to provide the Court with a status update in the above-referenced action.

The undersigned law firm is in the process of preparing an application for a clerk’s certificate of default, in anticipation of a motion for default, as against Defendants Happy Street LLC, Inc. and Happy Street Too LLC (together, the Corporate Defendants”), and Slobodan Radivojevic a/k/a Bob Radivojevic (the “Individual Defendant”, and collectively with the Corporate Defendants, the “Defendants”).

The undersigned anticipates being in a position to finalize and file the application for a clerk’s certificate of default on or before July 28, 2023.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel